

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CARLTON DOUGLAS, on behalf of himself, individually,
and on behalf of all others similarly-situated,

Plaintiff,

-against-

Docket No.:
18-cv-5789-GWG

ANTHEM PRODUCTIONS, LLC d/b/a ANTHEM
SOUND, STAGE, AND LIGHTING, and ADVANCED
AUDIO TECHNOLOGY, LLC d/b/a ANTHEM SSL, and
EVAGGELOS POULOS a/k/a ANGELO POULOS,
individually, and JOSEPH LODI, individually,
and JASON OJEDA, individually,

Defendants.

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**NOTICE OF PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND EXPENSES**

PLEASE TAKE NOTICE THAT named-Plaintiff Carlton Douglas, as well as the two opt-in Plaintiffs, Antonyio Brown and Doreen Rodriguez, (all three, together, as "Plaintiffs"), will move this Court, before the Honorable Gabriel W. Gorenstein, on a date and time to be determined by the Court, pursuant to Section 216(b) of the Fair Labor Standards Act and Sections 198 and 663 of the New York Labor Law, for an Order:

- (1) Awarding attorneys' fees in the amount of \$24,300.50; and
- (2) Awarding costs and expenses in the amount of \$4,547.34.

A memorandum of law and the Declaration of Jeffrey R. Maguire, together with Exhibits A through D, support this motion and are filed contemporaneously herewith.

PLEASE TAKE FURTHER NOTICE THAT pursuant to Local Rule 6.1(b) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, Defendants' opposition is due on or before March 30, 2020, and Plaintiffs' Reply is due on or before April 6, 2020.

Dated: New York, New York
March 13, 2020

Respectfully submitted,

BORRELLI & ASSOCIATES, P.L.L.C.

Attorneys for Plaintiffs

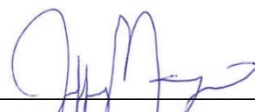
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By:

A handwritten signature in blue ink, appearing to read 'JM', is written over a horizontal line.

Jeffrey R. Maguire, Esq. (JM 1982)